

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER ECKHART and CATHY AREU, :  
: Plaintiffs, : Civil Case No. 1:20-cv-05593  
: against :  
FOX NEWS NETWORK, LLC, ED HENRY, :  
SEAN HANNITY, TUCKER CARLSON and :  
HOWARD KURTZ, in their individual and :  
professional capacities, :  
: Defendants.  
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**AFFIDAVIT OF EMILY LYNN IN SUPPORT OF  
DEFENDANTS' RULE 11 MOTION FOR SANCTIONS**

I, Emily Lynn, affirm the following to be true under penalty of perjury pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.9:

1. I have been employed with Fox News Network, LLC ("Fox News") since May 2015.

I am currently Coordinator, Production and Executive Assistant to Tucker Carlson, the host of *Tucker Carlson Tonight*, a Fox News Channel program that airs on Monday to Friday from 8 p.m. to 9 p.m. Eastern Time. I have worked in this role since July 2017. I am fully familiar with the facts and circumstances set forth herein and make this Affidavit in Support of Defendants' Rule 11 Motion for Sanctions.

2. I met Plaintiff Cathy Areu once in person in New York on November 30, 2018. Mr. Carlson was in New York for a speaking engagement and his show aired live from one of Fox News' New York City studios that evening, during which Ms. Areu appeared

as a guest on his show. This was the same night of the *Tucker Carlson Tonight* staff Christmas party, which was hosted by Mr. Carlson and his wife.

3. I assisted Mr. Carlson's wife in making arrangements for the Christmas party, including assisting her in the booking of Mr. Carlson's and her hotel room for the night.
4. Ms. Areu stayed until end of the show and spoke with Mr. Carlson. I do not recall Mr. Carlson or any staff member asking Ms. Areu to stay after the show. I witnessed the entire conversation between Ms. Areu and Mr. Carlson, which lasted five minutes or less.
5. Mr. Carlson did not change his clothes in the studio. In fact, Mr. Carlson wore the exact same clothes to the staff party after the show as he wore on the air on November 30, 2018.
6. At no time did Mr. Carlson ever state to Ms. Areu:
  - a. that he "would only be attending [the Christmas party] for approximately 10 minutes to, 'make a quick appearance'"';
  - b. that he "would be alone in New York City that night," or that he "would be staying alone in his hotel room without any wife or kids"; or
  - c. that he was "interested in a sexual relationship" or any other words that could reasonably be construed as an "advance" on Areu;as alleged in paragraphs 29-34 and 129-138 of Ms. Areu's Complaint.
7. Immediately after this conversation, Mr. Carlson and I went to the staff Christmas party. Mr. and Mrs. Carlson both attended and stayed until the end of the party.

8. *Tucker Carlson Tonight* did not air from New York City on December 10, 2018, which was the night of the Fox News Media company holiday party. Ms. Areu did not appear on *Tucker Carlson Tonight* on December 10, 2018.

Dated: 9/28/20

By:   
Emily Lynn